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## KML LAW GROUP, P.C. A PROFESSIONAL CORPORATION INCORPORATED IN PENNSYLVANIA

701 Market Street, Suite 5000 Philadelphia, PA 19106 (215) 627-1322 www.kmllawgroup.com

May 24, 2023

The Honorable Christine M. Gravelle, U.S.B.J. Courtroom #3 400 Cooper Street, 3rd Floor Camden, NJ 08101

RE: Deborah Costanza Case No. 19-28694 CMG

Premises: 73 Honeysuckle Dr., Manahawkin, NJ 08050

Secured Creditor: Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken

Loans Inc.

Dear Judge Gravelle,

This office represents Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc. ("Secured Creditor"), holder of a mortgage on real property located at 73 Honeysuckle Dr., Manahawkin, NJ 08050. Please accept this letter in response to Debtor's motion to sell the subject property.

Secured Creditor has reviewed the current motion to sell and the proposed form of order filed with the Court. Secured Creditor does not object to the motion or the proposed order in its current form. However, should the proposed order be revised, or if the underlying facts supporting the motion should change, including but not limited to the purchase price, Secured Creditor reserves its right to object to the motion.

The total amount owed on the loan thru June 5, 2023 is approximately \$276,988.03. The Debtor is required to request an updated formal payoff prior to closing to ensure the loan is paid in full in accordance with the terms of the note, mortgage and applicable state laws. Secured Creditor's response, in its present form, is not an objection to the current motion to sell the subject property. The undersigned does not intend to appear to prosecute an objection at this

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time unless the proposed order is amended to a form deemed objectionable.

Respectfully, KML LAW GROUP, P.C.

<u>Isl Denise Carlon</u>
Denise Carlon, Esquire
dcarlon@kmllawgroup.com
Attorney for Secured Creditor

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DISTRICT OF NEW JERSEY Docume	ent Page	e 3 of 4		
Caption in Compliance with D.N.J. LBR-9004-1				
KML Law Group, P.C. By: Denise Carlon Esquire 701 Market Street, Suite 5000 Philadelphia, PA 19106 201-549-2363 Attorneys for Secured Creditor: Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc.				
In Re: Deborah Costanza Debtor	Case No: Chapter: Judge:	19-28694 CMG  13  Christine M. Gravelle		
CERTIFICA	ATION OF	SERVICE		
1. I, Patricia Rychards:				
☐ Represent the in the above-captioned matter.				
☒ am the secretary/paralegal for Denis above captioned matter.	se Carlon, w	ho represents the Secured Cree	ditor in the	
☐ am the in the above case and am representing myself.				
<ol> <li>On 05/25/2023, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:</li> </ol>				

- Response to Motion to Approve Real Estate Contract and Sell Property
  Certification of Service
- 3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: 05/25/2023 /s/ Patricia Rychards

Name and Address of Party Served	Relation of Party to the Case	Mode of Service
Deborah Costanza	Debtor	☐ Hand-delivered
73 Honeysuckle Drive Manahawkin, NJ 08050		□ Regular mail
		☐ Certified mail/RR
		□ E-mail
		☐ Notice of Electronic Filing (NEF)
		□ Other
		(as authorized by the court *)
Steven J. Abelson Abelson Law Offices 80 West Main Street PO Box 7005 Freehold, NJ 07728	Attorney for Debtor	☐ Hand-delivered
		■ Regular mail
		☐ Certified mail/RR
		□ E-mail
		<ul><li>☒ Notice of Electronic Filing (NEF)</li></ul>
		□ Other
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Chapter 13 Trustee	(as authorized by the court *)
		☐ Hand-delivered
		☐ Regular mail
		☐ Certified mail/RR
		□ E-mail
		<ul><li>☒ Notice of Electronic Filing (NEF)</li></ul>
		□ Other
		(as authorized by the court *)